1	KRISTIN W. MURNAHAN (Georgia Bar No. 759054)		
2	murnahank@sec.gov		
3	M. GRAHAM LOOMIS (Georgia Bar No. 457868)		
4	loomism@sec.gov		
	Securities and Exchange Commission		
5	950 E. Paces Ferry Road, NE		
6	Suite 900		
7	Atlanta, GA 30326 Tel: (404) 842-7600		
8	Fax: (404) 842-7666		
9	UNITED STATES DISTRICT COURT		
10	DISTRICT OF NEVADA		
11		I	
12	SECURITIES AND EXCHANGE COMMISSION,		
13		Case No.: 2:25-cv-00105-JCM-BNW	
14	Plaintiff, v.	JOINT MOTION TO STAY	
15	QUEST EDUCATION L.L.C.,		
16	DANIEL BLUE, DAVID CHRISTOPHER WHITE, and		
17	KEITOH JORDAN SPEARS,		
18	Defendants		
19	D TTM MALLES		
		I	
20 21			
22			
23			
24			
25			
26			
27			

Plaintiff Securities and Exchange Commission, Defendants Quest Education L.L.C., Daniel Blue, Christopher White, and Keitoh Jordan Spears (herein together, the "Parties") jointly move this Court to stay discovery. Discovery in this matter is currently set to end in September 2025. Although the parties filed initial disclosures, the parties have not commenced depositions or written discovery because they began settlement negotiations during the Rule 26(f) conference. Those settlement negotiations have been fruitful, and the parties anticipate reaching an agreement in principle to a settlement of this matter in the near term. Prior to submission of the settlement to the Court, counsel for the Commission must submit the settlement to the Commission for approval. The Commission's review process typically takes six to eight weeks to complete. For this reason, the parties respectfully request that a stay of ninety (90) days be entered to allow the parties to finalize the settlement and seek the Commission's approval.

Respectfully submitted this 14th day of July, 2025.

/s/Kristin W. Murnahan
Kristin W. Murnahan

Georgia Bar No. 759054 murnahank@sec.gov

/s/M. Graham Loomis

M. Graham Loomis Georgia Bar No. 457868 loomism@sec.gov

Counsel for Plaintiff

United States Securities and Exchange Commission

950 E. Paces Ferry Road, NE

25 | Suite 900

Atlanta, GA 30326 (404) 842-7600

/s/Kimberly Stein
Kimberly Stein

Counsel for Defendants
FLANGAS LAW GROUP
3275 South Jones Blvd., Suite 105
Las Vegas, NV 89146

1 2 3 4 5 6 7 8	KRISTIN W. MURNAHAN (Georgia Emurnahank@sec.gov M. GRAHAM LOOMIS (Georgia Bar Noomism@sec.gov Securities and Exchange Commission 950 E. Paces Ferry Road, NE Suite 900 Atlanta, GA 30326 Tel: (404) 842-7600 Fax: (404) 842-7666	
9		S DISTRICT COURT
10	DISTRICT OF NEVADA	
11		
12 13	SECURITIES AND EXCHANGE COMMISSION, Plaintiff,	Case No.: 2:25-cv-00105-JCM-BNW
14 15 16 17 18	v. QUEST EDUCATION L.L.C., DANIEL BLUE, DAVID CHRISTOPHER WHITE, and KEITOH JORDAN SPEARS, Defendants	ORDER GRANTING MOTION TO STAY
19		
20 21		
22		
23		
24		
25		
26		
27		

Before this Court is the Joint Motion to Stay of the parties. The Court having 1 read and considered the motion, it is hereby GRANTED. This matter is stayed for 2 ninety days. The scheduling order is amended, and the new deadlines are as 3 follows: 4 5 Fact Discovery: December 22, 2025 6 Amending the Pleadings/Adding Parties: No change 7 Expert Disclosures: October 22, 2025 8 Rebuttal-Expert Disclosures: November 20, 2025 9 Dispositive Motions: January 20, 2026 10 Joint Pretrial Order¹: February 19, 2026² 11 IT IS SO ORDERED. 12 13 Dated: 7/17/2025 14 **BRENDA WEKSLER** 15 United States Magistrate Judge 16 17 18 19 20 21 22 23 24 ¹ Rule 26(a)(3) disclosures shall be included in Joint Pretrial Order. 25 ² If dispositive motions are filed, the deadline for filing the joint pretrial order will 26 be suspended until 30 days after decision on the dispositive motions or further

court order.

27